

**REMARKS/ARGUMENTS**

**Claim remarks with regards to 35 U.S.C. 102**

The examiner rejected claims 90, 98, 103, 106 and 107 under 35 U.S.C. 102(c) as being anticipated by Shneiderman (U.S. Patent No.: 7,010,751), herein after Shneiderman '751.

To anticipate the claimed invention the Shneiderman '751 reference must teach *each and every element* of the claims. For at least the reasons stated herein Applicant respectfully disagrees that the Shneiderman '751 reference anticipates each and every element of the claims as the Shneiderman '751 reference lacks numerous key elements of the invention and respectfully is clearly not the same system as claimed. Applicant wishes to point out that Shneiderman '751 teaches away from a "multi-user computer network" as Shneiderman '751 is a personal tool for the photograph enthusiastic to catalog and maintain his own personal collection (see Col. 3, 39-62).

**I. With regard to independent claims 90, 98 and 103**

Shneiderman '751 is a system directed to a system allowing for the annotation of photographs in a personal database used by photograph enthusiasts (see Col. 3, 39-62). These annotations are an arbitrary value provided by the one user adding and maintaining the personal library, which are then applied to the relevant photographs as desired (see Col. 4, 38-50). Relevant photographs can then be retrieved by searching the database for the corresponding

annotations (see Col. 5, 30-49). As such Shneiderman '751 is directed to the personal use of a database by one user to add, search, and maintain sets of image data and annotations. With respect to amended claim 90, 98, and 103, Shneiderman '751 does not contemplate, teach or suggest a "multi-user computer network" where a client interface is presented for "at least one searching user of "a plurality of searching users" for performing a query on result objects in image data. Shneiderman '751 also does not contemplate a client interface presented for "at least one providing user of a plurality of providing users to provide identifying information." Support for the amendments to claims 90, 98 and 103 is found in at least paragraphs 40-46, and 50-52 of the disclosure. Shneiderman '751 also lacks a mechanism whereby multiple computers can share information. Also in Shneiderman '751 a singular annotation cannot be differentiated between more than one user. For example in Shneiderman '751 if a user at computer A tagged someone as "Dad" in a first image, and a user at computer B tagged a different person as "Dad" in a second image, both images would still be tagged as "Dad" even though they identify different "Dads". Thus Shneiderman '751 lacks the ability to differentiate and uniquely identify objects across images.

## **II. With regard to dependent claims**

With respect to amended dependent claim 106 and dependent claim 107, these claims being dependent upon independent base claims that are allowable for the reasons stated in Section I above are also allowable as the dependent claims contain all the limitations of the base claims by reference. Shneiderman '751 does not contemplate, teach or suggest a result object presented to

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said “at least one searching user in a plurality of searching users” in a “multi-user computer network.” The amendment to claim 107 introduces no new matter for the same reasons explained above in Section I.

### **III. New dependent claims 108-113 and new independent claim 114**

These new claims are not shown or described by the art of record, are also allowable and does not constitute new matter for the reasons explained above.

### **CONCLUSION**

For at least the reasons stated herein, Applicant respectfully submits that the claims are in condition for allowance. A Notice of Allowance is earnestly solicited. Should the Examiner believe otherwise Applicant requests a telephonic interview as per the attached telephonic interview request form.

Respectfully submitted,  
Dalina Law Group, P.C.

A handwritten signature in cursive script, appearing to read "Joseph J. Mayo".

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